

All parties who commented agree with the proposed method to display an RCFed phone number at the PSAP. The Coalition believes that the proposal can and should be implemented by January 1, 1996. Pacific states that those PSAPs that it serves have been notified of the alteration to the ALI screen. DGS's comments emphasized that the method of display only addresses the situation where the subscriber remains at the same service location, and does not address the situation where a subscriber moves to a new location outside the present 911 Selective Router serving area while retaining their present telephone number.

The Smaller Independent LECs<sup>8</sup> joint comments noted that the primary PSAP for some areas served by Pacific and GTEC is located in territories served by smaller LECs. The Smaller Independent LECs believe that it is critical to educate the PSAPs in the smaller LECs' territory about impacts on E-911 service from changes related to RCF. Otherwise, PSAPs in the smaller LEC territories that receive calls originating in the territories of Pacific and GTEC may not be properly informed about changes in the information forwarded to them, which impacts how they handle calls to be forwarded on to secondary PSAPs. According to the Smaller Independent LECs, this could have tragic consequences. To ensure that education efforts are effective, the Smaller Independent LECs recommend a consistent method of implementing the RCF data field.

#### Discussion

Access to E-911 service is essential for each Californian. We will therefore require that every CLC be able to provide each of its customers with access to 911 services. To accomplish this mandate, Pacific and GTEC are ordered to take the

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<sup>8</sup> The Smaller Independent LECs who filed joint comments are: Calaveras; California-Oregon; Ducor; Foresthill; Happy Valley; Hornitos; Ponderosa; Sierra; and Winterhaven.

actions necessary to provide the CLCs with 911-interconnection services by the commencement of local exchange competition on January 1, 1996. Thereafter, Pacific and GTEC are to provide CLCs with 911-interconnection services in an efficient and timely manner.

We will adopt the proposed method of displaying RCFed phone numbers at the PSAP as agreed to by all the parties, to be implemented by January 1, 1996. We will require Pacific and GTEC to inform PSAPs both in their own territories and PSAPs located within the smaller LECs' territories that serve Pacific's and GTEC's customers about the changes to the ALI screen due to RCF before January 15, 1996. Since we are currently scheduled to issue a decision regarding rates for INP using RCF or other means by early February 1996, this timetable should provide an adequate opportunity for all PSAPs to be informed regarding the changes. We will also adopt the recommendation of the Smaller Independent LECs that Pacific and GTEC coordinate a method of consistently implementing education efforts.

**3. Requirement for CLCs to Provide 911 Service to Residential Customers Disconnected for Nonpayment**

All parties support requiring both facilities-based and resale CLCs to be responsible for providing their residential customers access to 911 service following disconnection of service due to nonpayment (i.e., warm line). PU Code § 2883 prohibits local telephone corporations from terminating 911 service to residential customers for nonpayment, and this requirement clearly applies to CLCs. Several parties recommended that the resale CLC should maintain warm line service for the duration of its lease for the unbundled loop, and that the resale CLC's responsibility for warm line service would revert back to the underlying facilities-based CLC or LEC upon termination of the lease. To enable resale CLCs to carry out their responsibility for warm line service, DRA recommends that facilities-based CLCs and LECs should offer

tariffed warm line service to CLC resellers. DRA recommends that no carrier, LEC or CLC, should be allowed to serve a residential customer without the ability to provide warm line service following disconnection for nonpayment. In the event a facilities-based carrier completely withdraws from a market area, the Coalition and DRA recommend that the carrier of last resort should provide the warm line service.

In the case of a ported number using INP and an unbundled loop, the Coalition recommends that the CLC should maintain warm line service but should not be required to maintain INP service on the telephone number which was originally ported to that line. The Coalition notes that the LEC/CLC responsibility ends at the demarcation point at the customer's premise, and warm line service should be provided to that point; beyond that point, it is the customer's responsibility to maintain premise wiring.

#### **Discussion**

We will require that all CLCs provide warm line service to their residential customers. No CLC shall be allowed to provide service to a residential customer without an ability to provide warm line service to the customer. To ensure reseller CLCs' ability to provide warm line service, we shall require facilities-based CLCs and LECs to offer warm line service to resale CLCs in their 911 tariffs. A resale CLC's obligation to provide warm line service to a customer shall continue as long as the CLC has an arrangement for resale service to the end user's premises. Following termination of the resale arrangement, the obligation to provide warm line service shall revert to the underlying facilities-based CLC or LEC. Finally, we will not require the CLC who is responsible for maintaining warm line service to a number disconnected for nonpayment to maintain any INP service on the telephone number which was originally ported to that line. It will be the CLC's responsibility, however, to make sure

that the 911 data base administrator is provided with any necessary information when INP is discontinued in order to ensure a proper and timely response to a 911 call.

**4. Providing 911 Interconnection Through  
Negotiated Agreements Versus Tariffs**

DGS sees no need to specify either contracts or tariffs for 911 interconnections since both have worked well in the past, provided that neither is used to delay the availability of needed service or cause an unjust profit.

Pacific states that it will tariff 911 interconnections, but supports allowing GTEC to contract for these arrangements. GTEC favors providing E-911 interconnections through negotiated agreements rather than tariffs since agreements will allow flexibility to accommodate the individual needs of the many different CLCs. As support for its position, GTEC cites the Commission's preference for mutual agreements expressed in D.95-07-054. As further support, GTEC notes that interconnection arrangements between LECs, including 411, E-911, and local intercept, have traditionally been accomplished through contracts; and that tariffing E-911 interconnection for CLCs would thus result in CLCs and LECs being treated differently.

Citizens, the Coalition, and DRA recommend that LECs provide E-911 interconnections under tariff. DRA believes that tariffs are more appropriate than contractual arrangements for a service as essential as E-911 interconnections. Both the Coalition and DRA believe that tariffs are less prone to abuse by LECs than contracts. The Coalition states that some CLCs have had a great deal of difficulty in negotiating E-911 service with GTEC. DRA believes that contracts could not be implemented by January 1, 1996, since there is insufficient time for the Commission to review and approve each contract by January 1, 1996. DRA thus views tariffing E-911 as the only feasible option for achieving the provisioning of 911 service to CLC customers by January 1, 1996. DRA notes that Pacific has already filed an advice letter to tariff its E-911 service, and both the Coalition and DRA recommend that GTEC be ordered to file its own E-911 tariff by December 15, 1995,

to offer E-911 service by January 1, 1996. If GTEC is unable to file its tariff by December 15, both the Coalition and DRA recommend that GTEC be required to concur in Pacific's tariff until GTEC's own E-911 tariff is approved by the Commission.

Discussion

To assure that E-911 service is available to the CLCs at the start of local exchange competition on January 1, 1996, we will require Pacific and GTEC to offer E-911 interconnections through tariff. We do this based on our belief that the local exchange companies will retain monopoly market power over the provisioning of E-911 service. The CLCs will be dependent on the incumbent LECs for the foreseeable future to obtain the necessary means to provide E-911 to their own customers. We therefore will classify E-911 services offered by Pacific and GTEC to the CLCs as a Category I service.

GTEC is hereby ordered to file a tariff for E-911 not later than January 31, 1996. We shall require GTEC to concur with Pacific's tariff during the interim and authorize GTEC to seek Z-factor recovery for the difference between the rates charged under Pacific's tariff and GTEC's actual cost of providing the service. We note that D.95-12-016 directs Pacific and GTEC to perform cost studies and submit this information in early 1996. Once cost studies have been approved, GTEC may file a Z-factor request in its next 1997 price cap filing to recover the difference between the adopted rates and those charged by GTEC under Pacific's tariff.

5. Length of Time to Provision 911  
Trunks to a CLC Requesting Interconnection

DGS does not comment on standardizing the length of time for each LEC to provision 911 service, but is concerned about Pacific offering 911 arrangements that are less reliable and more costly than GTEC's. DGS suggests that the Commission initiate a formal inquiry into the cost and time required to make Pacific's 911 network more like GTEC's by providing 911 tandem features at all end offices with the intent to offer a statewide standard 911 trunk access configuration.

Pacific and GTEC are opposed to a uniform time limit for provisioning E-911 interconnections since each LEC has a different internal means for processing of 911 service orders. Therefore, the length of time for a LEC to provision 911 trunks to a CLC is based upon the unique internal business processes and structure of each LEC. Pacific states that it will offer a standard interval of 30 business days for 911 trunk provisioning.

The Coalition supports a requirement for Pacific and GTEC to offer uniform terms and conditions for 911 interconnection, and recommends that a 13-day provisioning interval be the standard for all LECs and all CLCs.

Citizens believes that there should be no difference in the time required by a LEC to provide a CLC with 911 arrangements than the LEC requires to provide the same arrangements to other LECs. According to Citizens, LECs should be required to provide E-911 arrangements on substantially the same terms and conditions to CLCs as to other carriers absent some justifiable extenuating circumstance beyond the control of the LEC.

DRA recommends that LECs fill requests for 911 trunk service within 60 calendar days from the date the service is requested by a CLC. DRA believes that the length of time allowed for the LEC to provision 911 trunks to a CLC should be the same as for any other trunks connecting a LEC to a CLC and vice versa.

### **Discussion**

As stated previously, we intend to allow comparable access to E-911 by all CLCs which will require that both LECs offer 911 interconnections by tariff under the same terms and conditions. We are convinced that the availability to CLCs of a service as essential as E-911 should be as uniform as practical in order to enhance the protection of the health and safety of California residents; and to facilitate competition by CLCs who are mandated to provide 911 service. In keeping with this goal, we shall require both Pacific and GTEC to provision E-911 trunks within 30 business days from when ordered. Pacific and GTEC should include this provisioning interval in their tariffs.

We decline at this time to adopt DGS's proposal for us to initiate an inquiry into making Pacific's 911 network more like GTEC's in order that there be a statewide standard 911 trunk access configuration. Now is not the optimal time to standardize the 911 network configuration since the provisioning of E-911 will undoubtedly evolve as LEC/CLC 911 interconnection experience grows, and E-911 may someday not be provided by the LECs at all, but on a competitive basis.

**6. Length of Time for the CLC to Provide  
911 Database Information to the LEC  
and for the LEC to Update Its Database  
Following Receipt of the Information**

DGS recommends a maximum period of 24 hours for LECs/CLCs to update the 911 databases following completion of the service order. DGS believes the 24-hour period could be subdivided into two 12-hour periods. The first period would start when a service order is completed, and would end when the CLC or LEC transfers the 911 subscriber data to the 911 Data Manager (presently Pacific and GTEC). The second period would start when the 911 Data Manager receives the 911 subscriber data, applies the MSAG transaction, and updates the associated 911 Selective Router and ALI database

records. Each of these 12-hour periods could include a requirement that 100% of changes be completed within the 12-hour period and that 95% of changes are completed within a six-hour period. The DGS also recommends standard-format statistical reporting requirements for each CLC, LEC and the 911 Data Manager to provide information on an individual and global basis.

Pacific states each LEC is different, and that a CLC can have activated Data Management Services from Pacific upon 911 trunk activation if the CLC has the appropriate electronic file transfer capabilities. Pacific states that it can transfer information on the CLC's end user to the ALI retrieval system and the Selective Router within 24-48 hours.

GTEC suggests a uniform 48-hour time limit for processing 911 database information once it is received from the CLC, assuming that accurate information is provided by the CLC in agreed-upon formats.

The Coalition recommends that the time allowed for Pacific and GTEC to update their 911 record information with customer information submitted by CLCs be tariffed at 48 hours. The Coalition notes GTEC's statement that if it detects an error when the CLC submitted data is compared to the MSAG, GTEC will return the data within two business days to the CLC for correction. The Coalition asks that this two-day time period be tariffed as well.

DRA views customer location data as crucial for providing ALI to the local PSAP, and recommends that the Commission require the CLC to electronically provide the LEC with customer location data no later than 24 hours after service order completion.

#### Discussion

Since access to 911 service is essential to the health and safety of each Californian, we intend that the time allowed to process transactions associated with 911 end user information be as short as possible and uniform across LECs. CLCs should provide



information on new customers to the LEC within 24 hours of the order completion. LECs should update their databases within 48 hours of receiving the data from the CLC, a time frame both Pacific and GTEC state they can meet. If the LEC detects an error in the CLC-provided data, the data should be returned to the CLC within 48 hours from when it was first provided to them. Pacific and GTEC should include these terms in their E-911 tariffs.

**7. Provisions for Obtaining Master Street Address  
Guide (MSAG) Data**

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The MSAG is used in creating the Telephone Number to Emergency Service Number (TN-ESN) record in the 911 Selective Routers and to create the ALI record in the ALI data base. Each county owns its MSAG data, but Pacific and GTEC store and update the data in their 911 Management Systems.

DGS states that under the proposed serving arrangement, only Pacific and GTEC will continue to provision 911 Selective Routers and ALI data bases. DGS thus does not see a clear need for for CLCs to access the MSAG data.

Pacific states that a CLC may purchase MSAG from Pacific, and that Pacific can internally process the CLC's request for MSAG within 48-72 business hours. Pacific notes that delivery time will be dependent on the requested means of postage and delivery.

GTEC states that it is willing to provide MSAG information to a CLC if GTEC has received authorization from the counties who GTEC says own the MSAG data. Once authorized, GTEC is willing to provide the MSAG information on paper, diskette, or magnetic tape, at a cost that will depend on how much of the MSAG is needed, the number of copies, and the frequencies of updates required. GTEC is willing to provide time and material rates for this service, or is willing to develop separate contractual rates depending on the level of support requested by each CLC.

Citizens believes that LECs should provide MSAG to the CLCs on the same terms and conditions that MSAG is provided to other carriers.

The Coalition recommends that Pacific and GTEC be required to provide MSAG data on tape at tariffed rates and in a standard format suitable for use with desktop computers. The Coalition doubts GTEC's contention that ownership rights to MSAG are retained by the counties and that the CLC must obtain authorization to access the LECs' MSAG data from the appropriate county. To the extent that GTEC's contention is true, the Coalition recommends that the Commission seek to absolve the LECs of any liability for use or distribution of the MSAG data for 911 services.

DRA states that LECs are the designated service providers of last resort, and as such, the LECs have to coordinate with the county address data administrators to update their customer address records. DRA believes that the CLCs should be able to obtain MSAG data from the LECs, and recommends that the LECs be required to offer the MSAG data to the CLCs at tariffed rates. DRA recommends that the LECs be required to file their tariffs by December 15, 1995, and should GTEC fail to do so, then GTEC should be required to concur in Pacific's tariff.

#### Discussion

We shall require Pacific and GTEC to ship MSAG data within 72 business hours from the time requested. This is the maximum amount of time Pacific stated it would need, and GTEC did not indicate a longer time was necessary. We are unpersuaded by GTEC that CLCs must first obtain the county's authorization before GTEC may supply the MSAG data since Pacific views county authorization as unnecessary.

The LECs should provide the MSAG data on paper, diskette, magnetic tape, or in a format suitable for use with desktop computers. Each LEC may charge, on a nondiscriminatory basis, its

cost for offering MSAG data. The requirements we set forth today for the provision of MSAG data should be incorporated into Pacific's and GTEC's tariffs.

**8. Adequacy of 911 Tandem Location Maps  
for Establishing 911 Tandem Links  
by January 1, 1996**

DGS, the Coalition, and DRA have not yet seen the LECs' maps and thus could not comment on their adequacy. The Coalition recommends that Pacific and GTEC provide the maps at a set price. Following receipt of the maps by interested parties, the Coalition recommends that the Commission order a workshop, moderated by an ALJ and completed by mid-December, to resolve issues of exactly what information the maps should contain and any other database issues. Following the workshop, the Coalition asks for a ruling to be issued promptly to ensure that 911 service can be guaranteed by CLCs by January 1, 1996.

Pacific states that its router maps will be available by December 15, 1995, at a cost of \$50 to \$75. Pacific says its maps will reflect the selective router tandem locations as the end office codes that terminate at the specific selective router tandems.

GTEC believes that information currently available to the CLCs is sufficient for the CLCs to establish tandem links by January 1, 1996. GTEC states that it intends to recover the cost of providing information to the CLCs through contracts. The information GTEC states is currently available to the CLCs is as follows: (1) A listing by GTEC's E-911 tandems of all of the central offices and NXXs served by that tandem cross referenced with the district in which the central office is located; (2) A map of GTEC's E-911 network reflecting the applicable LATAs, the central office districts, and the E-911 tandems; and (3) An exchange map reflecting the general coverage of the GTEC's E-911

tandems, but requiring the detailed street information and the Emergency Services Number to be obtained from the MSAG.

Citizens believes that Pacific's provision of 911 route locations would be timely enough to allow service by January 1, 1996. Citizens recommends that Pacific should provide the vital information to other local carriers at no charge and recover the costs as part of the 911 service offering as is done today. Citizens provided no comments regarding GTEC.

DRA notes that Pacific has filed an advice letter to establish rates and charges for its E-911 and related service, but states that the tariff includes no rate for providing 911 router maps. DRA thus recommends that Pacific include in its tariff a rate for providing 911 router maps. GTEC has not filed tariffs for E-911 service, and DRA recommends that GTEC be required to do so, including tariffs for providing 911 router maps, by December 15 in order to allow CLCs to provide 911 service by January 1, 1996.

#### Discussion

We agree that Pacific and GTEC should offer the maps on a nondiscriminatory basis at a set price. Accordingly, Pacific and GTEC shall charge their cost for provisioning the maps, and the specific charge should be set forth in their tariffs. We reiterate that Pacific and GTEC are to provide the information necessary for CLCs to provide 911 service to their customers on January 1, 1996. Any failure by a LEC to supply the requisite information should be brought to our attention in the dispute resolution process described elsewhere in this decision.

#### 9. Requiring CLCs to Obtain an 800 Number for PSAPs to Access Subscriber Information

Currently, incoming 911 calls are routed to a PSAP. The PSAP accesses the ALI database which displays the address/location of the originating 911 call. If the PSAP attendant finds that the address/location information is wrong, the PSAP attendant calls the

LEC to verify the address/location information to properly guide the emergency service providers. DGS proposes expanding this arrangement to include CLCs as well as LECs.

The parties either support or do not oppose a requirement that CLCs provide a 24-hour contact point where PSAPs can obtain subscriber information in support of an active 911 call where the subscriber's proper address was not automatically forwarded with the call and the calling party is unable to provide their address. Citizens would oppose, however, any type of automated direct access to carrier's subscriber records.

Most parties' comments either supported or did not oppose the formation of an industry-led task force to monitor, enforce, and distribute the subscriber record access telephone numbers and 5-digit company codes. DRA recommends that enforcement of the requirement for CLCs to provide a 24-hour 800 number for inquiries from PSAP attendants should be the responsibility of the E-911 service administrator, which is DGS.

#### Discussion

Before CLCs provide service to customers, they must establish a 24-hour toll free number as a contact point where PSAPs can obtain subscriber information. We are not prepared at this time, however, to allow any type of automated direct access to CLC's subscriber records since there is insufficient information on the record concerning privacy issues associated with accessing subscriber records. We will therefore require that the 24-hour point of contact must always be staffed by competent and trained personnel.

We will also require that an industry-led task force be formed to monitor, enforce, and distribute the subscriber record access telephone numbers and five-digit company codes. CACD shall report back to us within 90 days on parties' progress in forming the industry-led task force.

**B. Intercompany Interconnection Service Order  
Reporting Standards Under GO 133-B**

Ordering Paragraph (OP) 7 of R.95-04-043 issued April 26, 1995, directed the General Order (GO) 133-B Review Committee to develop standards for interconnection service orders.<sup>9</sup> The Committee was to report its draft GO 133-B revisions to the Commission Advisory and Compliance Division (CACD) by December 31, 1995. Subsequently, in Decision (D.) 95-07-054, OP 8, the Commission ordered the following modification:

"DRA shall notify the Commission by October 1, 1995 as to whether the Committee has reached consensus on recommendations for additional standards for interconnection service orders. If no consensus recommendations have been reached, the ALJ will thereafter issue a ruling establishing a date for parties to serve testimony on this issue. If a consensus has been reached by that date, the ALJ will establish a due date for a consensus report to be filed."

On October 2, 1995, DRA reported to the assigned ALJ on the progress of the GO 133-B Review Committee in developing interconnection standards. DRA reported that the participants were able to agree on only the following issues:

1. The service quality standards for Intercompany Interconnection Held Service Orders (IIHSOs) should be included in a separate section of GO 133-B.
2. Participants reaffirm that all LECs and CLCs shall be subject to GO 133-B IIHO reporting standards.

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<sup>9</sup> GO 133-B sets forth uniform standards of service to be observed in the operation of telephone utilities as well as quality of service reporting requirements. The charter for the GO 133-B Committee is set forth in Part 5 of GO 133-B.

The assigned ALJ issued a ruling on November 13, 1995, which directed parties to file written comments by November 27, 1995, addressing additional standards for interconnection service orders.

Parties' Positions ~

Pacific

Pacific recommends that IIHSO service reporting be instituted concurrently with the introduction of facilities-based competition. For clarity, Pacific proposes that "Intercompany Interconnection Service Order" (IISO) be defined as "a request for interconnection of trunks and/or facilities between LECs and/or CLCs." Also for clarity, Pacific proposes that an IIHSO be counted as held when service is not provided within 15 days of the mutually agreed-upon due date for the completion of the request for the IISO.

Pacific recommends that IIHSOs be compiled and reported on a monthly basis in a format as appended to its comments. In its proposed report, Pacific would require each LEC and CLC to report for each IIHSO the following: (1) the service order number; (2) the due date; (3) the company requesting interconnection; (4) whether the IIHSO is overdue by 15-20, 21-25, 26-30, 31-35, 36-40, or over 40 days; (5) the reporting unit (wire center or plant installation center); (6) whether the IIHSO is pending or complete; and (7) an explanation for the IIHSO.

Pacific recommends that there be no automatic penalty mechanism built into the IIHSO reporting standard since a variety of circumstances beyond the LEC's control may cause IIHSOs, such as natural disasters, labor disputes, and civil disturbances. Pacific recommends that any LEC or CLC that feels it is being treated unfairly can bring the matter to the Forum OII or the Commission's formal and informal complaint process.

**GTEC**

GTEC states that IIHSOs reporting standards should be the same as that for end user held service orders which are reported quarterly to the CPUC. The report lists service orders that are held for specific reasons, and which are held for varying intervals. GTEC supports using the report form proposed by Pacific, with some minor modifications. GTEC recommends that no additional IIHSO reporting requirements be mandated. GTEC recommends that all facilities-based carriers begin submitting the reports 30 days after the first quarter of 1996; and resellers 30 days after the end of the second quarter of 1996.

GTEC sets forth interval provisioning standards in its proposed interconnection tariff, which are consistent with the intervals GTEC presently provides to its end users. GTEC recommends that all other provisioning standards be determined by contract. According to GTEC, contracts permit the flexibility necessary to accommodate the unique network arrangements, and other specific needs of each individual CLC. GTEC also states that contracts have traditionally been used for LEC-LEC interconnections and for the provision of 411, local intercept, and E-911 routing. Allowing contracts with CLCs, according to GTEC, would thus result in equal treatment of LECs and CLCs. In the event GTEC and a CLC cannot reach a contract, GTEC recommends use of the Forum OII to resolve the dispute.

Once the parties agree on a due date for the provisioning of a particular service from a LEC or CLC, the Held Order report would only be required if the service order is 30 days past due which GTEC states is consistent with the present Held Order reporting requirements of GO 133-B. GTEC proposes that the 30-day requirement could transition downward to 20 days after six months, and 15 days after nine months as all parties become familiar with LEC-CLC interconnection process. Ultimately, the new section of GO 133-B could contain a sunset clause which will require the



Commission and the parties to determine if the Held Service Order reporting process is still necessary.

**Coalition**

The Coalition recommends that a service order which misses its commitment date by five days should be counted as a held order and reported to the Commission in intervals so that an order held for five days can be distinguished from one that is held for 30 days.

To protect against abuses by LECs, the Coalition recommends a penalty mechanism for held orders in which a LEC would have to refund the installation charges associated with each held order. To implement the penalty mechanism, the Coalition recommends the following language be included in GO 133-B:

- a. **Description.** An intercompany interconnection service order will count as a held service order when service is not provided within five (5) days of the mutually agreed upon service date.
- b. **Measurements.** Count once a month the total intercompany interconnection service orders not completed by the service due date for the previous 30 days for each interconnecting company. Separate the results into four categories as follows: 0-4 days; 5-15 days; 16-30 days; and over 30 days.
- c. **Reporting frequency.** Compiled monthly and reported monthly on the last day of the following month.
- d. **Penalty mechanism.** Installation charges will be credited to the company requesting interconnection when the interconnection service is not provided by its service due date.

The Coalition endorses Pacific's report format for held orders. The Coalition does not support a sunset date for the IIHSO report until few, if any, held orders are reported.

The Coalition recommends that end user GO 133-B standards and the proposed intercompany interconnection held order standards apply to all telecommunications companies. Finally, the Coalition recommends that the GO 133-B intercompany interconnection standard be revisited once the Commission has adopted physical interconnection standards.

**DRA**

DRA believes that standards for carrier-to-carrier interconnection should be established and incorporated into GO 133-B; and that the standards be in place by December 29, 1995, in order for competitors to effectively enter the market on January 1, 1996. DRA strongly opposes any new standards or allowing standards to be negotiated on a case-by-case basis between carriers.

DRA recommends that the new service standards encompass held orders and service provisioning intervals. DRA believes that all carriers should report monthly on the new service standards which should be separately reported from end-user service standards. DRA recommends that the LECs' service standard reports be broken down by individual CLCs in order to assess if a particular CLC is being treated in a discriminatory manner by a LEC. DRA believes that the Commission's current service quality auditing measures are sufficient for verifying the accuracy of carrier-to-carrier service standard reports. DRA recommends that additional GO 133-B Committee meet-and-confer sessions should be held to establish the specific standards and reporting units. Finally, DRA suggests that negative incentives such as a penalty be established for serious violations of GO 133-B interconnection standards.

### Discussion

In our order of April 1995, we expressed concern about intercompany interconnection service quality.<sup>10</sup> Interconnection among local carriers is a prerequisite for the development of local exchange competition and the deployment of an ubiquitous public communications network connecting all Californians to one another and beyond. Our concern over the availability and quality of intercompany interconnection service standards led us to direct the GO 133-B Committee to develop standards applicable to interconnection service orders.<sup>11</sup> The GO 133-B Committee was able to provide only two relatively minor recommendations that (1) interconnection standards should be a separate part of GO 133-B, and (2) any interconnection standards should apply to all LECs and CLCs. We find these two recommendations to be reasonable and will adopt them.

We intend to rely on contracts rather than tariffs to govern intercompany interconnection arrangements. We agree with GTEC that contracts provide the flexibility necessary to accommodate the many different network interconnection arrangements necessary for the LECs and CLCs to interconnect. We disagree with GTEC, however, that we should not specify certain uniform intercompany interconnection standards. For effective local competition to exist, interconnection must take place in an efficient and timely manner. We will address here the standards required to achieve this goal. We specify elsewhere in this decision those parameters necessary to ensure that interconnection occurs in an efficient manner.

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<sup>10</sup> R.95-04-043/I.95-04-044, mimeo. p. 7.

<sup>11</sup> (Ibid.)

No party recommended that we establish standards governing the amount of time required to provision any specific interconnection arrangement. Instead, the parties focused on a local carrier's failure to provide any interconnection arrangement in the time frame agreed to by the carrier. We agree with the parties' focus since we could not realistically specify a standard provisioning time for each of the innumerable intercompany interconnection arrangements that are possible.

All the parties agreed that the Commission should monitor each carrier's IIHSOs, but could not agree on what IIHSOs should be reported to the Commission. We will adopt Pacific's proposal that a IIHSO be reported when the service is not provided within 15 days of the mutually agreed-upon due date. We find the Coalition's proposal for a five-day reporting standard to be too short for several reasons. First, we do not want to provide an incentive for a local carrier to incorporate extra slack when negotiating service due dates in order to avoid the possibility of reporting a held service order. Second, local carriers may occasionally misjudge service due dates, and we do not want to penalize honest errors in judgment by requiring local carriers to report the service orders held for only a few days. Finally, we want to balance the need for local carriers to report held service orders with tracking and reporting costs that increase as reporting intervals decrease. Conversely, GTEC's proposed 30-day standard for reporting held service orders is too long. Orders held longer than 15 days will negatively impact competitors who relied upon the promised due date in making their own service commitment dates to their customers. In addition, service orders held for fifteen days may indicate a service quality problem that should be investigated by the CPUC.

Most parties supported a requirement that IIHSO be compiled and reported on a monthly basis. We find the monthly reporting requirement to be reasonable, and direct the local carriers to file their IIHSOs on the last day of the following

month as recommended by the Coalition. All the parties were generally supportive of Pacific's proposed IIHSO report format. Since Pacific's proposed report contains most of the information necessary for reporting on IIHSOs, and we will adopt it with the one minor modification of adding an additional interval. Therefore, the IIHSO report we adopt today should contain the following information: (1) the service order number; (2) the due date; (3) the company requesting interconnection; (4) whether the IIHSO is overdue by 15-20, 21-25, 26-30, 31-35, 36-40, 40-45, and over 45 days; (5) the reporting unit (wire center or plant installation center); (6) whether the IIHSO is pending or complete; and (7) an explanation for the IIHSO. We will add to this list DRA's suggestion that the LEC's reports be broken down by individual CLCs in order to help us assess if a particular CLC is being treated in a discriminatory manner by a LEC. We agree with DRA that the Commission's current service quality auditing measures are sufficient for verifying the accuracy of carrier-to-carrier service standard reports. Since we do not know how long the IIHSO reporting requirement will remain necessary, we will not establish a sunset clause at this time for IIHSO reporting requirements.

We will require that IIHSO service reporting be instituted beginning January 1, 1996, so that we may monitor interconnection service quality from the start of local exchange competition. To reduce the potential number of disputes over held service orders, we will adopt Pacific's proposal to define an "Intercompany Interconnection Service Order" as "a request for interconnection of trunks and/or facilities between CLCs and/or LECs." Since we have established service standards and reporting units, DRA's recommendation for additional GO 133-B Committee meet-and-confer sessions is unnecessary.

We recognize that an IIHSO reporting requirement is not the same as a requirement that local carriers provision interconnection arrangements in a timely manner. We understand

that held service orders may have significant negative impacts on the quality of service provided to the customers of the entity requesting interconnection. Therefore, as an incentive to provide timely service order completion, we will require all local carriers to refund nonrecurring interconnection charges for service orders held 45 days beyond the mutually agreed upon service date. The refund provision we establish today will not apply if service order completion was delayed due to natural disasters, severe weather, labor disputes, or civil disturbances. If a company feels a particular refund is unfair, it may bring its case to us via the dispute resolution process described elsewhere in this decision.

**C. 611 Repair Service**

The adopted interim rules set forth in Appendix A of D.95-07-054 included a provision that: "LECs and CLCs shall develop a program to address the issues regarding access to repair service, i.e., 611, to ensure its integration in the environment of local exchange competition." (Rule 4.F.(11).)

The assigned ALJ directed by ruling dated August 18 that a report be filed by the LECs and CLCs regarding the development of a program for access to 611 repair service to ensure its integration into the competitive local exchange environment.

**Pacific**

On October 2, 1995, Pacific filed a report describing its 611 repair service access, as follows. An end user who calls "611" and reaches Pacific's Repair Service will be connected to the Customer Contact Services Node (CCSN) which is an Automated Voice Response Unit (AVRU). The end user is prompted to type in his or her telephone number. The CCSN then identifies whether the end user's local exchange carrier is Pacific or a CLC based on the NPA-NXX of the telephone number the end user types in. If the customer is not Pacific's customer, the CCSN will access a CLC referral number table to locate the CLC who serves the end user. The CCSN will then inform the end user that: "This is not a Pacific Bell

telephone number." And announce the name of the CLC and the CLC's Repair Service Number, stating that the number was provided to Pacific by the CLC. Pacific will employ this referral process for CLC end users who have retained their former telephone number through their CLC's use of Pacific's interim number portability service.

If the end user's telephone number is not found, the CCSN will transfer the end user to a Pacific Bell Customer Service Representative, who will attempt to find the end user's telephone number through other means. If found, then the service representative gives the end user the CLC Repair Service number found in the CLC referral table. If the number is still not found, the service representative will tell the end user to contact his or her CLC directly by referring the end user to his or her CLC bill or to use Directory Assistance. Pacific will not perform screening, testing or trouble isolation service to determine the source or location of a problem (e.g., trouble reports on inside wire) for end users who are not its customers. In order for Pacific to provide this referral service for any calls to its repair bureau (611 calls) or calls to its business office, to consumers without charge, Pacific proposes that it not be liable to end users, or to other providers, if it inadvertently directs a customer to an incorrect referral number.

For calls to Pacific's business offices from CLC customers, an AVRU will answer the call asking the end user to type in his or her telephone number. The CCSN will perform the same process as it does for calls coming in to the repair bureau on a "611" basis. For example, if the end user is not its customer of record, the CCSN will access a CLC referral number table and, if found, announce the name and service repair number of the CLC. The CCSN will identify whether the end user is a Pacific Bell customer or not. If the customer is not a Pacific Bell customer, and the end user's CLC is not found, the service representative will direct

the customer to refer to his or her CLC bill or to directory assistance for a referral number.

**GTEC**

GTEC believes the responsibility for providing repair service and handling customer inquiries regarding repair is that of the service provider, and that the CLCs should bear the cost of addressing and satisfying their customer repair service needs. While GTEC expresses a willingness to work cooperatively with the CLCs and the Commission to minimize consumer confusion in the initial phases of local competition, it objects to the imposition of additional operational costs associated with addressing repair service needs of non-GTEC customers.

GTEC intends to handle repair calls placed to its 611 repair service from a CLC customer as follows. Upon receipt of a CLC customer call to a GTEC repair number, GTEC will verify through existing GTEC database systems that the calling party is not a GTEC customer. GTEC's database system does not provide for the identification of the service provider responsible for the calling party's local exchange service. However, GTEC will refer the calling party to the appropriate CLC, so long as all certificated CLCs provide appropriate reference numbers for this purpose. If the calling party does not know the identity of his or her local service provider, GTEC will refer the calling party to their telephone bill or to the Commission for further assistance.

GTEC suggests that the Commission establish a telephone contact number for the purpose of allowing consumers to contact their service provider, if they do not know who their service provider is. Accordingly, the Commission could order each CLC to provide it with sufficient information to allow the Commission to make a referral to the appropriate CLC. GTEC will not perform any repair service function for non-GTEC customers.

Unlike Pacific, GTEC does not have the associated CCSN and associated databases. In summary, GTEC objects to providing



any repair service function for a competitor, without appropriate compensation. In GTEC's view, a referral to either the CLC itself or the Commission for further assistance is a reasonable resolution to any repair service problems.

**DRA**

DRA recommends that each carrier utilize its own service technicians beginning January 1, 1996. If they are not ready to provide their own technicians on this date, CLCs should be required to provide an implementation timeline to the Commission stating when they intend to begin servicing their own customers.

DRA further believes that ample customer notice must be given as to how the 611 system will work once competition is in place. Questions as to who the customer should notify, and how their service will be provided and by whom, need to be addressed in a notice to the customer. Customers should be notified on their bill as well as when they initiate service if they choose a carrier other than the one they currently utilize. This is one reason DRA supports a "universal" 611 system such as described above. The customer could continue to dial 611 for their repair needs as they currently do, instead of having to learn other numbers.

DRA is also concerned about who will handle major outages. It seems that the carrier who provides the service would also take care of any outages. However, DRA is uncertain as to how this arrangement would work in the resale environment.

DRA believes that the 611 system should be universal such that a customer of any carrier who dials 611 and enters their phone number will, through an automated system, be connected to their appropriate carrier. Another possibility that would cut down on customer frustration would be to have the customer automatically forwarded to their carrier after dialing 611. A live operator would replace the automated system and that operator upon receipt of the customers' phone number would then forward the customer to the appropriate carrier's repair service.